

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

PENDLETON HEIGHTS GAY-STRAIGHT
ALLIANCE, an unincorporated association,

Plaintiff,

Case No: 1:21-cv-02480-JRS-TAB

v.

SOUTH MADISON COMMUNITY SCHOOL
CORPORATION; PRINCIPAL, PENDLETON
HEIGHTS HIGH SCHOOL, in her official
capacity,

Defendants.

AFFIDAVIT OF EILEEN NEELEY

1. My name is Eileen Neeley, I am over eighteen (18) years of age, and I have personal knowledge of the facts stated herein.
2. I am an English Teacher at Pendleton Heights High School.
3. I am also a sponsor for the Outdoor Adventure Club.
4. I receive a stipend as the sponsor of Outdoor Adventure Club because it is a corporation-sponsored club.
5. Students in Outdoor Adventure Club participate in a variety of outdoor, physical activities including camping, horseback riding, canoeing, rock climbing, hiking, spelunking, and skiing.
6. The purpose of Outdoor Adventure Club is to provide students with opportunities to learn and develop skills and habits that promote a lifetime of activity.

7. The physical activities of the club are selected with the goal of teaching students about activities they are likely to engage in after high school.

8. The objective of the Outdoor Adventure Club is to teach students the skills necessary to participate in those physical activities, to teach them the benefits of those physical activities, and to promote competence and confidence in a variety of physical activities in multiple environments.

9. The activities of the Outdoor Adventure Club are directly related to the Physical Education curriculum that is taught at Pendleton Heights High School.

10. The Indiana Academic Standards for Physical Education emphasize fitness, movement competence, and promoting physical activity so that students can adopt active lifestyles.

11. The physical education curriculum is centered on the concept of physical literacy.

12. Physical literacy is defined by SHAPE America – Society of Health and Physical Educators as “the ability to move with competence and confidence in a wide variety of physical activities in multiple environments that benefit the healthy development of the whole person.”

13. The goal of the Pendleton Heights physical education curriculum, based on the Indiana Academic Standards for Physical Education, is to develop physically literate individuals who have the knowledge, skills and confidence to enjoy a lifetime of healthful physical activity.

14. The Outdoor Adventure Club is directly related to the physical education curriculum in that it teaches students the skills necessary to participate in a variety of physical activities, teaches the benefits of being involved in various types of physical activities, and encourages students to participate regularly in physical activity as part of a healthy lifestyle.

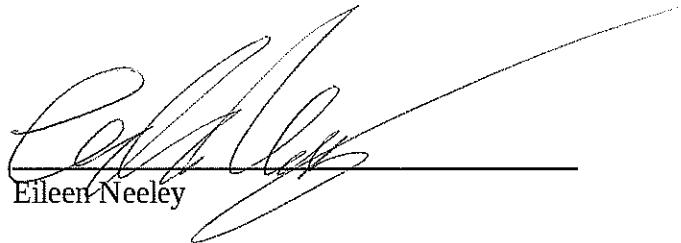
15. Additionally Outdoor Adventure Club teaches students skills pertaining to work employability skills standards.

16. The development of these activities contributes to an employability mindset in building self-confidence by taking risks in the introduction of new ideas pertaining to camping, hiking, climbing, skiing, canoeing and spelunking.

17. In learning new skills, students develop a work ethic that includes self-discipline, independence, and perseverance. By working outside of the classroom, students learn the fundamentals of outdoor activities in a supervised environment, then continue using those transferable skills throughout other experiences.

18. The Outdoor Adventure Club promotes the application of learning strategies as referenced in the Indiana Employability Skills Standards. Through problem solving and decision making, students are able to benefit from participating in a variety of outdoor activities and a healthy lifestyle.

Date: 12/09/2021



Eileen Neeley

A handwritten signature in black ink, appearing to read "Eileen Neeley". The signature is fluid and cursive, with a long horizontal stroke extending to the right.